From: Ex. 4 - CBI
Sent: 3/15/2012 11:05:23 AM

To: "Cynthia Caporale" <Caporale.Cynthia@epamail.epa.gov>
CC: "Kelley Chase" <Chase.Kelley@epamail.epa.gov>; "Fred Foreman" <Foreman.Fred@epamail.epa.gov>
Subject: RE: EXTERNAL: Re: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

OK. Thanks!

From: Cynthia Caporale [mailto:Caporale.Cynthia@epamail.epa.gov]
Sent: Thursday, March 15, 2012 11:00 AM
To: Ex. 4 - CBI
Cc: Kelley Chase; Fred Foreman
Subject: RE: EXTERNAL: Re: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

Deb,
Both approaches to qualifying non-confirmed results are acceptable; however, to maintain consistency with the first set of reports, use the "R" qualifier to indicate that the results are not usable (rejected).
And, since the LC/MS/MS analysis was completed on all samples, the results have been confirmed as non-detected.
Cindy
Cynthia Caporale, Chief
OASQA Laboratory Branch
U.S. EPA Region III
Environmental Science Center
Fort Meade, MD
(410) 305-2732
Fax: (410) 305-3095
From: Ex. 4 - CBI
To: Cynthia Caporale/ESC/R3/USEPA/US@EPA
Date: 03/15/2012 09:16 AM
Subject: RE: EXTERNAL: Re: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

Cindy,

I need to clarify your response because I am confused. The validation report qualified data under the RL as "R" because second column confirmation was not done. In your response you are saying that the modified NFG in Region 3 says that all target compounds not confirmed are "U".

I just want to be sure that I understand the response before I give instructions to the SERAS personnel on site to change qualifiers. If it would be easier to talk, give me a call.

For instances with dual column confirmation, the Region 3 Modifications to NFG for Organic Data Review state that all target compounds that are not confirmed should be considered non-detected. Therefore, for results above the Reporting Limit (>RL), 10 U would be appropriate. Qualifying results below the Reporting Limit (<RL) as rejected "R" or "10U" is appropriate.
Deb

Ex. 4 - CBI
Lockheed Martin
Scientific, Engineering, Response and Analytical Services (SERAS)
Ex. 4 - CBI
732-494-4021 (Fax)

From: Cynthia Caporale [mailto:Caporale.Cynthia@epamail.epa.gov]
Sent: Thursday, March 15, 2012 8:58 AM
To: Ex. 4 - CBI
Cc: Ex. 4 - CBI; Gary Newhart; John Gilbert; Kelley Chase; Ex. 4 - CBI; Sella Burchette; Fred Foreman; Robin Costas
Subject: EXTERNAL: Re: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

Kelley and Deb,
The reports on the Dimock Verification/Completeness Check for Test America Reports WO 15712 and 15814 were reviewed and below are the responses for your consideration.
Test America-Validated Report-R33917 480-15712-1.PDF
1. Method blank (MB 480-50495/1) contained triethylene glycol and diethylene glycol above the method detection limit (MDL). The associated samples are qualified as follows: triethylene glycol is non-detect (U) for samples FB07, HW18, HW26 and HW26-P. Diethylene glycol is non-detect (U) for samples FB07, HW18, HW18-P, HW20, HW20-P, HW25-P, HW26, HW26-P, HW29 and HW29Z. Method blank (MB 480 50613/1-A) contained diethylene glycol above the MDL. The associated samples are qualified as follows: diethylene glycol non-detect (U) for samples HW32, HW32-P, HW33, HW33A-P, HW33B-P, HW34A-P and HW52.

Response: **Elevating the QL and qualifying "U" is not the typical procedure for R3 validation; however, we support the decision to follow the NFG procedures for blank contaminants. Since results were qualified "R" the conclusion is these compounds were not present and, therefore, blank contamination is not applicable.**

2. On qualifications of detections based on a second column analysis, Section 7.6.4 of SW846 8015B states, tentative identification of a single component analyte occurs when a peak from a sample extract falls within the daily retention time window. Confirmation is required on a second column or by GC/MS. Since the flame ionization detector is non-specific, it is highly recommended that GC/MS confirmation be performed on single component analytes unless historical data are available to support the identification(s). The qualification of unusable "R" by the Region 3 validation team is agreed upon for triethylene glycol results for samples HW32 and HW34a if results greater than the MDL but less than the RL are to be reported. If results <RL are reported as recommended by SW-846 methods, then these results become a 10U.
NOTE: Waiting for a response on this issue.

Response: **For instances with dual column confirmation, the Region 3 Modifications to NFG for Organic Data Review state that all target compounds that are not confirmed should be considered non-detected. Therefore, for results above the Reporting Limit (>RL), 10 U would be appropriate. Qualifying results below the Reporting Limit (<RL) as rejected "R" or "10U" is appropriate.**

3. The holding times were checked from the time of collection on the chain of custody (COC) to the time of analysis on the analysis log sheet. Holding time review was based on a 14-day period. No additional qualifications are required.

Response: **No response needed.**

4. Raw data was not provided, it is assumed that all sample detections were within the established retention time criteria and the stated concentrations in the LCS and MS/MSD tables are correct and pass their QC criteria. No additional qualifications are required.

Response: **Raw data is available and were evaluated during the validation process.**

5. A 4 point initial calibration was used by the laboratory instead of the recommended minimum of 5 points. As previously noted in a response from Fred Foreman on 3/9/12, the lab uses a modified analysis and typically uses a 4-point calibration. No additional qualifications are required.

Resposne: **No response needed.**

Test America-Validated Report-R33917 480-15814-1.PDF

1. Method blank (MB 480-50789/1) contained diethylene glycol above the method detection limit (MDL). The associated samples are qualified as follows: diethylene glycol is non-detect (U) for samples EB02, FB09, HW09-P and HW28a. Method blank (MB 480 51003/1-A) contained diethylene glycol and triethylene glycol above the MDL. The associated samples are qualified as follows: diethylene glycol is non-detect (U) for samples HW40-P, HW41, HW45, HW46 and HW46-P and triethylene glycol is non-detect (U) for samples HW40-P, HW46 and HW46-P.

Response: **Elevating the QL and qualifying "U" is not the typical procedure for R3 validation; however, we support the decision to follow the NFG procedures for blank contaminants. Since results were qualified "R" the conclusion is these compounds were not present and, therefore, blank contamination is not applicable.**

2. On qualifications of detections based on a second column analysis, Section 7.6.4 of SW846 8015B states, tentative identification of a single component analyte occurs when a peak from a sample extract falls within the daily retention time window. Confirmation is required on a second column or by GC/MS. Since the flame ionization detector is non-specific, it is highly recommended that GC/MS confirmation be performed on single component analytes unless historical data are available to support the identification(s). The qualification of unusable “R” by the Region 3 validation team is agreed upon for triethylene glycol results for samples EB02, FB09, HW09 and HW28a, if results greater than the MDL but less than the RL, are to be reported. If results <RL are reported as recommended by SW-846 methods, then these results become a 10U.

NOTE: Waiting for a response on this issue.

Response: **For instances with dual column confirmation, the Region 3 Modifications to NFG for Organic Data Review state that all target compounds that are not confirmed should be considered non-detected. Therefore, for results above the Reporting Limit (>RL), 10 U would be appropriate. Qualifying results below the Reporting Limit (<RL) as rejected "R" or "10U" is appropriate.**

3. The holding times were checked from the time of collection on the chain of custody (COC) to the time of analysis on the analysis log sheet. Holding time review was based on a 14-day period. No additional qualifications are required.

Response: **No response needed.**

4. Raw data was not provided, it is assumed that all sample detections were within the established retention time criteria and the stated concentrations in the LCS and MS/MSD tables are correct and pass their QC criteria. No additional qualifications are required.

Response: **Raw data is available and were evaluated during the validation process.**

5. A 4 point initial calibration was used by the laboratory instead of the recommended minimum of 5 points. As previously noted in a response from Fred Foreman on 3/9/12, the lab uses a modified analysis and typically uses a 4-point calibration. No additional qualifications are required.

Resposne: **No response needed.**

Cynthia Caporale, Chief
OASQA Laboratory Branch
U.S. EPA Region III
Environmental Science Center

Fort Meade, MD
(410) 305-2732
Fax: (410) 305-3095
From: Ex. 4 - CBI
To: Cynthia Caporale/ESC/R3/USEPA/US@EPA, Kelley Chase/R3/USEPA/US@EPA
Cc: John Gilbert/CI/USEPA/US@EPA, Gary Newhart/CI/USEPA/US@EPA, Sella Burchette/ERT/R2/USEPA/US@EPA, Ex. 4 - CBI Ex. 4 - CBI
Date: 03/13/2012 09:55 AM
Subject: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

.....are attached for your review and consideration.

Ex. 4 - CBI
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